

SEALED

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AT HARRISONBURG, VA

FILED

3/20/2018

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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

**IN THE MATTER OF THE SEARCH
OF: 215 DEER PLACE COURT,
STRASBURG, VA 22657**

SEALED

Case No. 5:18-mj-00031

MOTION TO SEAL

The United States of America requests that the Application for a Search and Seizure Warrant, Affidavit in Support of the Application, Search and Seizure Warrant, this Motion to Seal, and the Order to Seal, remain under seal of this Court for the following reasons:

1. The government states that the disclosure of the above-listed documents would seriously jeopardize the ongoing investigation, including by giving unidentified targets an opportunity to flee from prosecution, destroy or tamper with evidence, change patterns of behavior, or notify confederates.

2. Sealing is necessary because the items and information to be seized are relevant to an ongoing investigation and not all of the targets of this investigation will be searched at this time. Online criminals actively search for criminal affidavits and search warrants via the Internet, and disseminate them to other online criminals as they deem appropriate, *i.e.*, post them publicly online through forums. Premature disclosure of the contents of the above-listed documents may have a significant and negative impact on this continuing investigation and may jeopardize its effectiveness by alerting potential targets to the existence and nature of the investigation, thereby giving them an opportunity to flee, or to destroy or tamper with evidence.

3. Given the nature and scope of this investigation, including the sensitive nature of

the information, the international scope of the investigation, the involvement of potential victims of child sexual exploitation, who may need to be identified and located, the electronic nature of the evidence, and the sheer volume of images that have been identified in the preliminary stages of this investigation, the government expects that it will take time to receive the information and to conclude the investigation into that activity.

For the reasons set forth above, the government respectfully moves this Honorable Court to seal the above-listed documents for 180 days or until further order of this Court.

Respectfully submitted,

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